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October 15, 2013

Via USPS Express Mail

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90; **2013 FCC Form 481**

Dear Ms. Dortch:

In compliance with the Commission's rules at 47 CFR §§ 54.313(h)(2)(i) and 54.422(c), Kalida Telephone Company, Inc. ("Kalida") herewith submits a copy of its 2013 Form 481.

Kalida requests that the financial results required in the section entitled "Rate of Return Carrier Additional Information"¹ be accorded confidential treatment. Attached please find a statement of the reasons for withholding the redacted materials from public inspection pursuant to 47 CFR § 0.459.

Kalida has e-filed, through ECFS, the redacted version and sent via USPS Express Mail the confidential version (original and one copy) of its 2013 FCC Form 481.

Thank you for your attention to this matter.

Sincerely,

THOMAS, LONG, NIESEN & KENNARD

By:


Norman J. Kennard

NJK:tlt

¹ The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. <http://www.usac.org/hc/tools/forms.aspx>. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form submitted employs the 3005 or 3000 designation.

STATEMENT OF CONFIDENTIALITY REQUEST AND JUSTIFICATION OF KALIDA TELEPHONE COMPANY, INC.

Kalida Telephone Company, Inc. ("Kalida" or "Company") is a small, privately held rural local exchange company based in Ohio. Kalida requests confidential treatment of certain information being provided to the Commission in its 2013 FCC Form 481, because the information is competitively sensitive and its disclosure would have negative competitive consequences upon Kalida were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 CFR § 0.459.

Specifically, Kalida requests that the documentation required in the section entitled "Rate of Return Carrier Additional Information,"¹ which consists of the Company's financial reports, income statement, balance sheet and cash flow statement, be accorded confidential treatment ("Confidential Information").

Degree to Which the Information in Question is Commercial or Financial, or Contains a Trade Secret or is Privileged

The Confidential Information is financial information, specifically the Company's income statement, balance sheet and cash flow statement. Financial Information is clearly deserving of confidential treatment.

The Confidential Information is also a trade secret under 5 U.S.C. § 552(b)(4). While there is no clear federal definition, the *Uniform Trade Secrets Act* defines trade secret as information that derives independent economic value, actual or potential, from not being generally known to or readily ascertainable through appropriate means by other persons who might obtain economic value from its disclosure or use and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. <http://www.uniformlaws.org/Default.aspx>. The information for which confidential treatment is sought meets that definition.

Degree to Which the Information Concerns a Service that is Subject to Competition

Ohio has successfully opened its telecommunications markets to full competition. The services offered by the Company, including voice and broadband services, are subject to vigorous competition from competitive local exchange carriers, cable operators, wireless carriers

¹ The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. <http://www.usac.org/hc/tools/forms.aspx>. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form submitted employs the 3005 or 3000 designation.

and VoIP providers. Many of the Company's competitors are large, well-financed and national, even international, in scope.

Manner in Which Disclosure of the Information Could Result in Substantial Competitive Harm

The Confidential Information could be employed by both existing and potential competitors in a variety of ways, including: to determine the size of the market; the profitability of the market; and the financial resources of the Company. Clearly, were the Confidential Information made public, competitors could and would use this information to their competitive advantage. Moreover, disclosure would adversely affect Kalida's ability to conduct business with other carriers.

Measures Taken to Prevent Unauthorized Disclosure

The Company has taken precautions to guard the secrecy of its financial results, including the Confidential Information, by limiting its dissemination. The Confidential Information is not known outside of Kalida and is known within the Company only to senior managers and a limited number of employees with a particular need to know. Kalida has expended a significant amount of time and money in developing the Confidential Information. The Confidential Information cannot be replicated by any other means.

Availability of the Information to the Public and Extent of Any Previous Disclosure of the Information to Third Parties

The Confidential Information is not available to the general public and has never been disclosed to any outside third parties, except as may be associated with financing, in which case confidentiality is required.

Justification of the Period During Which the Material Should Not be Available for Public Disclosure

Kalida requests that the Confidential Information be maintained on a confidential basis indefinitely. Disclosure of the information at any time would be harmful.

Any Other Information That the Party Seeking Confidential Treatment Believes May Be Useful In Assessing Whether Its Request For Confidentiality Should Be Granted.

Exemption 4 of the Freedom of Information Act protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." 5 U.S.C. § 552(b)(4). The exemption affords protection to those submitters who are required to furnish

commercial or financial information to the government by safeguarding them from the competitive disadvantages that could result from disclosure. If the financial information relates to business or trade, courts have considered it “commercial or financial.” *See, e.g., Dow Jones Co. v. FERC*, 219 F.R.D. 167, 176 (C.D. Cal. 2002) (information relating “to business decisions and practices regarding the sale of power, and the operation and maintenance” of generators (quoting agency declaration)); *Merit Energy Co. v. United States Dep’t of the Interior*, 180 F. Supp. 2d 1184, 1188 (D. Colo. 2001) (“information regarding oil and gas leases, prices, quantities and reserves”), *appeal dismissed*, No. 01-1347 (10th Cir. Sept. 4, 2001). The Confidential Information satisfies this test as well.

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-9989/0001 Control No. 3060-0019 July 2013
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<010> Study Area Code	326625
<015> Study Area Name	KALIDA TEL CO
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Joyce Gross
<035> Contact Telephone Number: Number of the person identified in data line <030>	419-532-3216
<039> Contact Email Address: Email of the person identified in data line <030>	jgross@kalidatel.com

ANNUAL REPORTING FOR ALL CARRIERS		54.803 Completion Required	54.822 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	4	4
<200> Outage Reporting (voice)	(complete attached worksheet)	4	4
<210> <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 -- check box if no outages to report		4	4
<300> Unfulfilled Service Requests (voice)	0	4	4
<310> Detail on Attempts (voice)	(attach descriptive document)	4	4
<320> Unfulfilled Service Requests (broadband)	0	4	4
<330> Detail on Attempts (broadband)	(attach descriptive document)	4	4
<400> Number of Complaints per 1,000 customers (voice)		4	4
<410> Fixed	0.0	4	4
<420> Mobile	0.0	4	4
<430> Number of Complaints per 1,000 customers (broadband)		4	4
<440> Fixed	0.0	4	4
<450> Mobile	0.0	4	4
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	4	4
<510> 396425008510	(attach descriptive document)	4	4
<600> Functionality in Emergency Situations	(check to indicate certification)	4	4
<610> 20425008510	(attach descriptive document)	4	4
<700> Company Price Offerings (voice)	(complete attached worksheet)	4	4
<710> Company Price Offerings (broadband)	(complete attached worksheet)	4	4
<800> Operating Companies and Affiliates	(complete attached worksheet)	4	4
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> Y <input checked="" type="radio"/> N	(if yes, complete attached worksheet)	4	4
<1000> Voice Services Rate Comparability	(check to indicate certification)	4	4
<1010> <input type="radio"/> Y <input checked="" type="radio"/> N	(attach descriptive document)	4	4
<1100> Terrestrial Backhaul (Y/N)? <input type="radio"/> Y <input checked="" type="radio"/> N	(if not, check to indicate certification)	4	4
<1110> <input type="radio"/> Y <input checked="" type="radio"/> N	(complete attached worksheet)	4	4
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	4	4
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet			
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	(check to indicate certification)	4	4
<2005>	(complete attached worksheet)	4	4
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	4	4
<3005>	(complete attached worksheet)	4	4

(100) Service Quality Improvement Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	304625
<015>	Study Area Name	KALIDA TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Grace
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-932-1210
<039>	Contact Email Address - Email Address of person identified in data line <030>	joyce@kalidatel.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<p>If your answer to line <111> is yes, then you are required to file a progress report on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.</p> <p><112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.</p>		
<p>Please check these boxes below to confirm that the attached PDF, on line <112>, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.</p>		
<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

(700) Private Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0166 OMB Control No. 2980-0219
July 2022

<010>	Study Area Code	910-628
<015>	Study Area Name	WALTON TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Koyce Stone
<035>	Contact Telephone Number - Number of person identified in data line <030>	415-532-3216
<039>	Contact Email Address - Email Address of person identified in data line <030>	kyce@walton-tel.com

<701>	Residential Local Service Charge Effective Date	1/1/2025
<702>	Single State-wide Residential Local Service Charge	

<702> Single State-wide Residential Local Service Charge

[illegible]

[710] Broadband Price Offerings

<Q10>	Study Area Code	300626
<Q15>	Study Area Name	KALIMA TEL CO
<Q20>	Program Year	2016
<Q30>	Contact Name - Person USAC should contact regarding this data	Joyce Eruse
<Q35>	Contact Telephone Number - Number of person identified in data line <Q30>	419-531-3216
<Q39>	Contact Email Address - Email Address of person identified in data line <Q30>	joyceer@kalidatc1.com

[illegible]

(200) Operating Companies
 Data Collection Form

FCC Form 481
 Data Collection No. 2020-0906/OMB registration No. 3165-0819
 July 2013

<010>	Study Area Code	300625
<015>	Study Area Name	MILLIKEN TEL CO
<020>	Program Year	2004
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Grace
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-532-1216
<039>	Contact Email Address - Email Address of person identified in data line <030>	jo_grace@milliken1.com
<810>	Reporting Carrier	Wilda Telephone Company
<811>	Holding Company	
<812>	Operating Company	

<B13>	<B1>	<B2>	<B3>
Affiliates	SAC		Doing Business As Company or Brand Designation

(800) Tribal Lands Reporting Data Collection Form		FCC Form 421 OMB Control No. 3060-0086/OMB Control No. 3060-0019 July 2013
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<010>	Study Area Code	306425
<015>	Study Area Name	201121 TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Grace
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-532-3210
<039>	Contact Email Address - Email Address of person identified in data line <030>	jyjoyce@telco.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, or line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- | Select
(Yes, No,
NA) |
|-------------------------------------|
| <input checked="" type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting		FCC Form 481
Data Collection Form		OMB Control No. 3060-0085/OMB Control No. 3040-0819
		July 2013

<010>	Study Area Code	300625
<015>	Study Area Name	KALINA TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Stone
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-832-3218
<039>	Contact Email Address - Email Address of person identified in data line <030>	joyce@kalinatel.com

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☒

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0619	
		July 2013	

<010>	Study Area Code	300625
<015>	Study Area Name	KALLILA TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Grote
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-597-2210
<039>	Contact Email Address - Email Address of person identified in data line <030>	joyces@kallidatel.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	See 625081110
		Name of attached document (.pdf)

<1220>	Link to Public Website	HTTP
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"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan,	<input checked="" type="checkbox"/>

(2010) Price Cap Carrier Additional Documentation		ICC Form 451
Data Collection Form		ICC Form 451, 3060-0985/CMO, Carrier No. 3060-0815
<i>Including Rate of Return Carriers and Carriers with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	300 625
<015>	Study Area Name	KEL IDA TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Spence
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-512-3216
<039>	Contact Email Address - Email Address of person identified in data line <030>	joyce@skelidatel.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting (47 CFR § 54.313(b))		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached PDF, on line 2021, contains the required information pursuant to § 54.313(e)(3)(i), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	
Name of Attached Document Listing Required Information		

33000 Rate-Of-Return Carrier Approval Documentation Data Collection Form		FCC Form 483 SHS Control No: 5262 OS&A/OW&S Compliance, 33000-0019 June 2013
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310	State Area Code	300625
315	State Area Name	WALTON, FL, US
320	Program Year	2014
325	Contact Name - Person USA should contact regarding this data	JOHN G. STICK
330	Contact Telephone Number - Number of person who has been the contact	419-517-2211
335	Contact Email Address - Email Address of person certified in 330	john.g.stick@data1.com

CHECK the boxes below to note compliance with the five year service quality plan pursuant to 47 CFR § 54.202(a) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.310(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Program Reporting 5 Year Plan		Name of Attached Document Listing Required Information
(3010) Wireless Carrier (47 CFR § 54.310(2))		
Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.310(2).	<input type="checkbox"/>	
(3012) If yes, does your company (or the RUS annual report recipient of CAF Phase II support) provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>	
(3013) Community Anchor Institutions (47 CFR § 54.310(2))		
If yes, does your company (or the RUS annual report recipient of CAF Phase II support) provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>	
(3014) Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.310(2) compliance requires:	<input type="checkbox"/>	
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016) PDF of Balance Sheet, Income Statement, and Statement of Cash Flows	<input type="checkbox"/>	
(3017) If the response is yes on line 3014, attach your company's RUS annual report and a required document on:		
(3018) If the response is no on line 3014, is your company subject?	<input type="checkbox"/>	
If the response is yes on line 3018, please check the boxes below to confirm your compliance, on line 3020, pursuant to § 54.310(2), containing:	<input type="checkbox"/>	
(3019) Either a copy of their audited financial statement, or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020) PDF of Balance Sheet, Income Statement, and Statement of Cash Flows	<input type="checkbox"/>	
(3021) Management letter issued by the independent certified public accountants that performed the company's financial audits:	<input type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your compliance, on line 3023, pursuant to § 54.310(2), containing:	<input type="checkbox"/>	
(3022) Copy of their financial statement which has been subject to review by an independent certified public accountants; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023) Underlying information subjected to a review by an independent certified public accountants	<input type="checkbox"/>	
(3024) Underlying information subjected to an officer certification	<input type="checkbox"/>	
(3025) PDF of Balance Sheet, Income Statement, and Statement of Cash Flows	<input type="checkbox"/>	
(3026) Attach the worksheet listing required information		300625CH3 025

Certification - Reporting Carrier Data Collection Form		FCC Form 482 DTM: Control No. 2302-0000/OMB Control No. 3060-0819 June 2013
<010> Study Area Code	30625	
<015> Study Area Name	KALIDA TEL CO	
<020> Program Year	2014	
<030> Contact Name - Person USAC should contact regarding this data	Joyce Grote	
<035> Contact Telephone Number - Number of person identified in data line <030>	419-532-3218	
<039> Contact Ema Address - Ema Address of person identified in data line <030>	joyce@kalidatel.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or U Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	KALIDA TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 10/07/2013
Printed name of Authorized Officer:	Chris Phillips
Title or position of Authorized Officer:	CO, Treasurer
Telephone number of Authorized Officer:	419-532-3218
Study Area Code of Reporting Carrier:	30625 Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3050-0066 EIN: 30-0000000 July 2012
<010> Study Area Code	301425	
<015> Study Area Name	301425 TEL CO	
<020> Program Year	2014	
<030> Contact Name - Person USAC should contact regarding this data	Joyce Orze	
<035> Contact Telephone Number - Number of person identified in data line <030>	415-552-3218	
<039> Contact Email Address - Email Address of person identified in data line <030>	joyce@301425.tel.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or U Recipients on Behalf of Reporting Carrier	
I, <u>(Name of Agent)</u> , am authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons who make false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or U Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons who make false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

10/07/2013

(700) Price Offerings including Voice Rate Data
Data Collection Form

DMB Control No. 116-0986 DMB Control No. 116-0986
100 1113

DMB Control No. 116-0986 DMB Control No. 116-0986
100 1113

14-00000

<010>	Study Area Code	300625
<015>	Study Area Name	KALIJA TEL CO
<070>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Joyce Gorte
<035>	Contact Telephone Number - Number of person identified in data line <030>	419-552-3215
<039>	Contact Email Address - Email Address of person identified in data line <030>	joyce@kalliatel.com

<701>	Residential Local Service Charge Effective Date	1/1/2019
<702>	Single State-wide Residential Local Service Charge	

27032

[illegible]

KALIDA TELEPHONE COMPANY, INC.

121 E. Main Street ♦ Box 267 ♦ Kalida, Ohio 45853
Phone 419-532-3218 ♦ Fax 419-532-3300 ♦ Email ktc@kalidatel.com

FOR IMMEDIATE RELEASE:
January 29, 2013

FOR MORE INFORMATION CONTACT:
Stacey Birkemeier 419-532-3218
stacey@kalidatel.com

Please publish the info below in the Putnam County Sentinel.

Save On Your Telephone Bill

Qualified customers can save on their phone bill with the Kalida Telephone Company. The Kalida Telephone Company offers savings to qualified customers through the Lifeline Telephone Assistance Program in the following ways: a \$9.25 monthly discount for regulated local services; a waiver of phone line establishment charges once in a 12 month period; free blocking of toll, 900 and 976 services; a waiver of the Company's service deposit requirements and a waiver of the federal universal fund end user charge.

Payment arrangements will also be made for these qualified customers with past due bills for regulated service with the Company. Qualifying customers with past due toll service charges shall have toll restricted service until the past due toll services have been paid.

Qualified customers must have either a household annual gross income at or below 150% of the federal poverty level; or, be enrolled in one of the following programs: Medicaid or any state program which might supplant Medicaid; Supplemental Nutritional Assistance (SNAP/Food Stamps); Supplemental Security Income (SSI); Social Security Disability Insurance (SSDI); Federal Public Housing or Section 8; Home Energy Assistance Program (HEAP, LIHEAP, E-HEAP); National School Free Lunch Program (NSL); Disability Assistance (DA); Temporary Assistance for Needy Families (TANF/Ohio Works and General Assistance, including disability assistance (DA).

Federal Rules prohibit qualified customers from receiving more than one Lifeline service per household. Lifeline benefits may be applied to only one type of service - landline or wireless. Benefits would be lost if customer is found to have more than one per household. Eligibility must be reconfirmed every year and if at any point a customer no longer qualifies, the Company must be notified immediately.

For all the savings and program details call the Kalida Telephone Company at 419-532-3218.

This notice is required by the federal government.

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PUCO Emergency Plan

4901:1-6-31

Emergency and Outage Operations

Effective: 1/20/2011

- (A) Each facilities-based local exchange carrier (LEC) shall design, operate, and maintain its facilities to continue to provide customers with the ability to originate and receive calls at all times. The commission will utilize existing FCC rules applicable to emergency and outage operations. Companies shall submit outage reports utilizing, at the company's discretion, either existing FCC reports or a format determined by the commission.
- (B) Each facilities-based LEC shall submit, within two hours of discovery, to the commission's outage coordinator and when appropriate, the news media in the affected area, a notification that it has experienced an outage, whenever that outage occurs on any facility that it owns, operates, leases or otherwise utilizes and is both:
 - (1) Expected to last for a period in excess of thirty minutes.
 - (2) Potentially affects at least nine hundred thousand user minutes in the incumbent local calling area.
- (C) Each facilities-based LEC shall report, by telephone or electronic means, a disruption of 9-1-1 services, which impairs 9-1-1 service within a given county 9-1-1 system, immediately to each county 9-1-1 public safety answering point, to the Ohio 9-1-1 coordinator, and to the news media in the affected area, when appropriate.
- (D) Each facilities-based LEC experiencing a loss of communications or selective routing to a public safety answering point, as a result of an outage described under paragraphs (B) and (C) of this rule, shall also notify, as soon as possible, by telephone or electronic means, any official who has been designated by the management of the affected 9-1-1 facility as the LEC's contact person for communication outages at that facility; and the LEC shall convey to that person all available information that may be useful to the management of the affected facility in mitigating the effects of the outage on efforts to communicate with that facility.
- (E) Each facilities-based LEC experiencing an outage described under paragraphs (B) and (C) of this rule, shall electronically submit to the commission's outage coordinator the same information as that provided to the FCC or the following information:
 - (1) A notification that it has experienced a outage, which shall include the name of the reporting entity, the date and time of the onset of the outage, a brief description of the problem, the particular service affected, the geographic area affected by the outage, the number of customers affected, an estimate of when the service, including 9-1-1, will be restored, and a contact name and telephone number by which the commission's outage coordinator may contact the reporting entity.
 - (2) Not later than seventy-two hours after discovering the outage, an initial communications outage report, which shall include all pertinent information then available on the outage and shall be submitted in good faith.
 - (3) Not later than thirty days after discovering the outage, the provider shall submit electronically a final communications outage report, which shall include all pertinent information on the outage, including any information that was not contained in, or that has changed from that provided in, the initial report.

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(F) Each facilities-based LEC shall develop, implement, and maintain an emergency plan and make it available for review by commission staff. The plan shall include, but not be limited to, all of the following:

- (1) Procedures for maintaining and annually updating a list of those customers who have subscribed to the federal telecommunications service priority program, as identified in 47 C.F.R. 64, appendix A.
- (2) Procedures for priority treatment in restoring out-of-service trouble of an emergency nature for customers with a documented medical or life-threatening condition.
- (3) In addition to the telecommunications service priority program, each LEC shall develop policies and procedures regarding those customers who require priority treatment for out-of-service clearance. Such procedures shall include a table of restoration priority, including, but not limited to, subscribers such as police and fire stations, hospitals, key medical personnel, and other utilities.
- (4) Procedures for restoring service to priority critical facilities customers.
- (5) Identification and annual updates of all of the facilities-based LEC's critical facilities and reasonable measures to protect its personnel and facilities.
- (6) Assessments and evaluations of telecommunications facilities available to provide back-up service capabilities.
- (7) Procedures for after-action assessments and reporting following activation of any part of the emergency plan. An after-action report will be written and will include lessons learned, deficiencies in the response to the emergency, and deficiencies in the emergency plan.
- (8) A current list of the names and telephone numbers of the facilities-based LECs' emergency service personnel to contact and coordinate with in the event of any real or anticipated local or national threats to its ability to provide telecommunications service.
- (9) A current list of the names and telephone numbers of the facilities-based LEC's emergency service personnel that is made available to the commission's emergency coordinator, upon request.
- (10) A continuity of operations plan to assure continuance of minimum essential functions during a large scale event in which staffing is reduced. Such plans shall provide for:
 - (a) Plan activation triggers such as the world health organization's pandemic phase alert levels, widespread transmission within the United States, or a case at one or more locations within Ohio.
 - (b) Identification of a pandemic coordinator and team with defined roles and responsibilities for preparedness and response planning.
 - (c) Identification of minimal essential functions, minimal staffing required to maintain such essential functions, and personnel resource pools required to ensure continuance of those functions in progressive stages associated with a declining workforce.
 - (d) Identification of essential employees and critical inputs (e.g., raw materials, equipment, suppliers, subcontractor services/products, and logistics) required to maintain business operations by location and function.
 - (e) Policies and procedures to address personal protection initiatives.

(f) Policies and procedures to maintain lines of communication with the public utilities commission of Ohio during a declared emergency.

(G) Each facilities-based LEC shall amend its emergency plan in accordance with the findings identified in the after-action assessment report required under paragraph (F)(7) of this rule.

R.C. 119.032 Review Dates:	11/30/2015
Promulgated Under:	111.15
Statutory Authority:	4927.03
Rule Amplifies:	4927.04
Prior Effective Dates:	None

KALIDA TELEPHONE COMPANY, INC.

STATEMENT OF CPNI PROCEDURES

Kalida Telephone Company, Inc. has created a CPNI Policy Handbook containing the following procedures that it has adopted to ensure the protection of CPNI. The handbook describes our procedures in greater detail and provides practical guidance on how to protect against unauthorized disclosure or use of CPNI. The handbook is distributed to our employees during training and serves as an important reference tool for our employees.

Duty to Protect CPNI

We as a communications company recognize our duty to protect customer CPNI. We may not disclose CPNI to unauthorized persons, nor may we use CPNI in certain ways without consent from our customers. Before we can provide customers with their own CPNI, we must authenticate the customer.

We recognize that there are a few cases in which we can disclose CPNI without first obtaining customer approval:

1. Administrative use: We may use CPNI to *initiate, render, bill and collect* for communications services.
2. Protection of carrier and third parties: We may use CPNI to protect the interests of our company, such as to prevent fraud or illegal use of our systems and network. Employees are notified of the steps to take, if any, in these sorts of situations.
3. As required by law: We may disclose CPNI if we are required to by law, such as through legal process (subpoenas) or in response to requests by law enforcement. Employees are notified of any steps they must take in these situations.

Our Own Use Of CPNI

We may use CPNI to provide or market services to our existing customers. We understand that we are required to obtain customer approval prior to using CPNI in certain ways.

Marketing

We understand that we do not need to obtain customer approval before using CPNI to market services to our existing customers within the categories of service to which the customer already subscribes.

We understand that we may not use CPNI to market services that are in a service category to which the customer does not already subscribe without customer approval.

We understand that we cannot use CPNI to solicit a customer to add a new category of service without first obtaining the customer's approval.

We also understand that we do not need customer consent before using CPNI to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call

tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain centrex features.

We understand that we may not use CPNI to identify or track customers that call competing service providers.

We regularly review our marketing practices to determine when and how CPNI is used within the company, and whether CPNI is being shared with other entities. We also review new marketing or sales campaigns to ensure compliance with these CPNI policies and with the FCC's CPNI regulations. We do not share CPNI with any affiliates or other third parties.

Provision of Services

We understand that we do not need customer approval to use CPNI to provide CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

Authenticating Customers Before Disclosing CPNI

We understand that we are required to objectively determine that our customers are who they say they are before disclosing CPNI to them.

Telephone

We understand that when a customer calls, we may not release *call detail information*, or information relating to the transmission of specific telephone calls until we have called the customer back at the telephone number of record to ensure that the customer is who s/he says s/he is. Alternatively, we may offer to send the call detail information to the address of record or provide it to the customer or an authorized individual in person after s/he has produced valid photo identification at our office.

We understand that we may disclose *non-call detail information* over the telephone after authenticating the customer by calling back the telephone number of record, checking valid photo identification, or by mailing the information to the account address of record.

In-Person Authentication

We understand that before we can disclose CPNI to customers in person, the customer must present *valid government-issued photo identification*. The name on the photo identification must match the name on the account. If the customer cannot present the required identification, we offer to provide the requested CPNI by sending it to the account address of record.

Before providing the CPNI to the customer, we make a copy of the photo identification. This copy is then placed in the customer's file, together with a copy of the CPNI provided to the customer. These records are then kept in the customer file in accordance with our record-keeping policies.

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Mail

If the customer requests CPNI through regular mail, or if the customer cannot comply with one of the authentication methods above, we send the requested information to the customer's address of record only.

Customer Notification of CPNI Rights

We provide a CPNI privacy policy to all customers annually, as a bill insert in the December bill. This policy provides notification to each customer of his/her right to restrict use of, disclosure of, and access to that customer's CPNI. We maintain a list of all customers who receive the privacy policy, the date on which the policy is sent, and a copy of the policy in our records for one (1) year following the mailing of the policy. We provide additional copies of the CPNI privacy policy to all customers who request it and to all new customers upon activation of service.

The policy contains an opt-out customer approval notice. Customers who do not wish to allow us to use their CPNI to market services outside their existing service categories, or who do not wish to allow us to share their CPNI with affiliates, have 30 days to contact us to tell us that they do not approve of this use. If we do not hear back from the customer within 30 days, we understand that we are free to use their CPNI for these purposes. We understand that customers can change their option at any time by contacting us, and we notify our customers of this right.

We maintain records of the customers who received the opt-out approval notice and records of the customers who contacted us to opt out in accordance with our record-keeping policies.

We understand that we must provide written notice to the FCC within five (5) business days if our opt-out mechanisms do not work properly to the degree that our customers' inability to opt out is more than an anomaly.

Training And Discipline

We trained all of our employees regarding the company's CPNI policies prior to the effective date of the most recent CPNI regulations, December 8, 2007. Employees are required to attend an annual retraining to ensure that they understand the company's CPNI policies and any updates to those policies. New employees who will have access to CPNI are trained when they join the company, and then attend the regularly-scheduled retraining sessions. At the conclusion of each training session, employees are asked to sign certificates stating that they understand the company's CPNI policies and that they will comply with those policies.

Employees who fail to observe Kalida Telephone Company, Inc.'s CPNI procedures will be subject to the disciplinary procedures contained in the Phone Company Disciplinary Policy. Disciplinary records are maintained in the company files in accordance with our record-keeping policies.

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Record-Keeping

We maintain the following records in our files for one (1) year:

- a. Records relating to the annual mailing of the customer CPNI privacy policy;
- b. Records of customer approval or disapproval of CPNI use, or the limitation or revocation thereof; and
- c. Employee disciplinary records.

We maintain records of discovered CPNI breaches, notifications to law enforcement regarding breaches, and any responses from law enforcement regarding those breaches, in our files for at least two (2) years.

Notification Of Account Changes

We understand that we are required to notify customers when changes have been made to passwords, customer responses to back-up means of authentication, or addresses of record by mailing a notification to the account address of record.

We do not reveal the changed account data in the notification.

Unauthorized Disclosure Of CPNI

We understand that we must report CPNI breaches to law enforcement no later than seven (7) business days after determining the breach has occurred, by sending electronic notification through the link at <http://www.fcc.gov/eb/CPNI/> to the central reporting facility, which will then notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI).

We understand that we may not notify customers or the public of the breach earlier than seven (7) days after we have notified law enforcement through the central reporting facility. If we wish to notify customers or the public immediately, where we feel that there is "an extraordinarily urgent need to notify" to avoid "immediate and irreparable harm," we inform law enforcement of our desire to notify and comply with law enforcement's directions.

Records relating to such notifications are kept in accordance with our record-keeping policies. These records include: (i) the date we discovered the breach, (ii) the date we notified law enforcement, (iii) a detailed description of the CPNI breached, and (iv) the circumstances of the breach.

During the course of the year, we compile information regarding pretexter attempts to gain improper access to CPNI, including any breaches or attempted breaches. We include this information in our annual CPNI compliance certification filed with the FCC.

Signed

